

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

YUESAI LIN,

Plaintiff,

-v.-

KRISTI NOEM, *et al.*,

Defendants.

No. 25 Civ. 3848 (JPC)

NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of the Motion to Dismiss the Complaint and the declarations of Brett H. Hassen and Mollie Isaacson, Defendants Kristi Noem, Secretary, U.S. Department of Homeland Security; Kika Scott, Director, U.S. Citizenship and Immigration Services (“USCIS”); Mollie Isaacson, Director, USCIS Newark Asylum Office; Kash Patel, Director of the Federal Bureau of Investigation; and Pamela Bondi, Attorney General of the United States, by their attorney, Jay Clayton, United States Attorney for the Southern District of New York hereby move this Court for an order dismissing the Complaint pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: July 15, 2025
New York, New York

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Danielle J. Marryshow
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SO ORDERED.
Date: July 16, 2025
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge